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8 *Attorneys for Defendant, Conn Appliances, Inc.*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 MELVIN NICHOLAS,

9 Plaintiff,

10 vs.

11 TRANS UNION, LLC; EXPERIAN  
12 INFORMATION SOLUTIONS, INC.; CONN  
13 APPLIANCES, INC.; CARMA  
14 ENTERPRISES INC. dba LAS VEGAS  
15 FINANCE; and SUN LOAN COMPANY  
16 NEVADA, INC.,

Defendants.

Case No.: 2:23-cv-02110-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND TO  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

(First Request)

17 Plaintiff, Melvin Nicholas ("Plaintiff"), and Defendant, Conn Appliances, Inc.  
18 ("Defendant") (collectively "Parties"), by and through their counsel of record, hereby stipulate and  
19 agree as follows:

20 On February 16, 2024, Plaintiff filed his First Amended Complaint [ECF No. 19].  
21 Defendant was served with Plaintiff's First Amended Complaint on February 16, 2024. The  
22 deadline for Defendant to respond to Plaintiff's First Amended Complaint is March 1, 2024. The  
23 Parties have discussed extending the deadline for Defendant to respond to Plaintiff's First  
24 Amended Complaint to allow for better investigation of the allegations and discuss possible  
25 resolution of the matter.

26 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to  
27 file its responsive pleading to Plaintiff's First Amended Complaint to April 1, 2024.

28 This is the first request for an extension of time for Defendant to file its responsive

pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

As part of this stipulation, Defendant agrees to participate in any Rule 26(f) conference that occurs during the pendency of this extension.

DATED this 1st day of March, 2024.

WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

/s/ Ramir M. Hernandez

/s/ Gerardo Avalos

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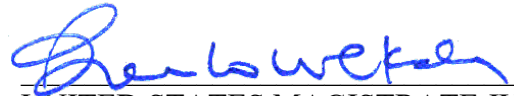
*Attorneys for Defendant, Conn Appliances, Inc.*

8985 S. Eastern Ave. Suite 350

Las Vegas, NV 89123

*Attorneys for Plaintiff, Melvin Nicholas*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 3/5/2024

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT (First Request)** on the 1st day of March, 2024, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP